

Remarks

Claims 1-27 are pending.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-14 and 16-27 were rejected under 35 U.S.C. 102(e) as being anticipated by Ozzie et al. (U.S. Patent No. 6,640,241). This rejection is traversed. As shown below, Applicant submits that Ozzie does not disclose all of the features of the claimed invention as is required in a section 102 rejection.

Applicant respectfully submits that for a section 102 rejection to apply, the identical invention must be shown in as complete detail as is contained in the claim. See M.P.E.P. 2131. Ozzie discloses the usage of peer units each with a communications manager where each of the peer units can send a multicast to other peer units. The Office suggests that this multicasting is disclosed by the column 16, lines 44-65 of the Ozzie reference and therefore appears to suggest that a peer unit as defined by Ozzie is a master initiator as claimed herein. This suggestion is respectfully traversed. Applicant respectfully submits that each of Ozzie's peer units as exemplified by the use of the term "peer" and by the inclusion of a communication manager in each of the peer units shows that there is no hierarchical relationship among the peer units. Therefore, Applicant respectfully submits that there is no master initiator as described by the specification of the present patent application where the master initiator is capable of multicasting over the network. The master initiator is also capable of mapping network target connections for use by other initiators on the network. Therefore, Applicant respectfully submits that the peer unit of Ozzie is not a master initiator. Consequently, Applicant respectfully submits that Ozzie does not disclose all of the features of the claimed invention as is required in a section 102 rejection. Therefore, Applicant respectfully requests that the section 102 rejection to independent claims 1, 11, 21, and 23 be withdrawn. Applicant also

submits that the claims depending directly or indirectly from the independent claims are allowable for at least the reasons that the independent claims are allowable.

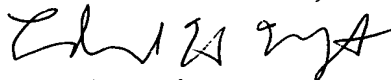
Claim Rejections Under 35 U.S.C. § 103(a)

Claim 15 was rejected under 35 U.S.C. 103(a) as being unpatentable over Ozzie. Applicant respectfully traverses this rejection. Applicant respectfully submits that the Office fails to make a prima facie case of obviousness with respect to the claimed invention because the cited prior art reference does not disclose or suggest all of the features of the claimed invention.

As discussed above, Ozzie does not disclose or suggest usage of a master initiator capable of multicasting over the network. Consequently, Applicant submits that Ozzie does not render any of the pending claims obvious. Therefore, Applicant respectfully requests that the section 103 rejection be withdrawn.

Applicant respectfully requests a Notice of Allowance based on the foregoing remarks. If the Examiner has any questions concerning the present paper, the Examiner is kindly requested to contact the undersigned at (408) 749-6900. If any other fees are due in connection with filing this paper, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP085A2). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
MARTINE & PENILLA, LLP



Edmund H. Mizumoto
Reg. No. 46,938

Martine & Penilla, LLP
710 Lakeway Drive, Suite 200
Sunnyvale, California 94086
Tel: (408) 749-6900
Customer Number 25920